

RECD'D 7/1/2019 10:11 AM (EST)
THE UNITED STATES
DISTRICT COURT FOR
THE MIDDLE DISTRICT
OF GEORGIA
MACON DIVISION
Amendment 1

RECD'D 7/1/2019 10:11 AM (EST)
THE UNITED STATES

David Keith Green 4245819833 And Title II ADA claim
Plaintiff

v Case# 5:20-cv-418 MTR-CHW

Christy Lane, Corey King
Westley Palmer, Venessa Lewis
Matthew Marshall, Quanies Walker
Kentrell Andrews, Trey Burgamy
Beasly McNeely, Kason Anderson
Eric Burgamy, Victoria Pullam
Blake Domrey
Defendants

Plaintiff alleges under an Type II ADA claim
Respondents in fact it is clear that the
alleged deliberate refusal to accommodate
Plaintiff in an ADA approved vehicle for
wheelchair accessible to transport Plaintiff
in. Violates Plaintiff's rights under the
ADA. Based on a large part of the conduct
the independently violated the provisions
of cl of the fourteenth Amendment. see (Francis v.
Besweber 329 U.S. 459, 463, 67. 5, CT 374 91L
Ed. 422 1941)

Due process clause of the fourteenth Amendment incorporates the Eighth Amendment guarantee against cruel and unusual punishment.

Plaintiff was man handled and put in a van or F150 pickup to be transported. This violates the Type II ADA Standards, "Deliberate Indifference" see "Miller v. King 384 F3d 1248" ("United States v. Georgia 546 U.S. 151

- ① States an alleged conduct violates the Title II of ADA Act.
- ② Such alleged misconduct also violates the constitution
- ③ Violates the Title II but does not violate the constitution, see United States v Georgia 546 U.S. 151 justification. Plaintiff alleged sufficient conduct to proceed with a 1983 due claim based on Lane Et AL supposed "Deliberate Indifference" to his serious medical condition of being partially paraplegic in a wheelchair. See "Miller v King 384 F3d 1248" "Discrimination" of Plaintiffs Rights under Type II Claim

Paul K. Johnson